

## PRIVACY POLICY

### About This Privacy Policy

Chillistick believes it is important to protect your Personal Data and we are committed to giving you a personalised service that meets your needs in a way that also protects your privacy.

This policy explains how we may collect and use Personal Data about you. It also explains some of the security measures we take to protect your Personal Data, and tells you certain things we will do and not do.

It is important that you read this Privacy Policy together with any other privacy notice on our website from time to time so that you are fully aware of how and why we are using your data.

If you have any questions about this Privacy Policy or your rights under it please contact us through our [customer contact page](#) or email [info@chillistick.com](mailto:info@chillistick.com)

### Controller

Chillistick Ltd is the controller and responsible for your personal data (collectively referred to as, “we”, “us” or “our” in this Privacy Policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us via our [contact page](#) and state that your query is for the attention of the DPO.

### Contact Details

Chillistick Limited, is a limited company, operating in the United Kingdom. Our company registration number is number 05591382. VAT registration number is 120907541. Postal address: Chillistick Ltd, Unit 4, Ringway Centre, Edison Rd, Basingstoke, RG21 6YH. You can also contact us through our [customer contact page](#).

## What personal data do we collect?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When you shop with us online or browse our websites or use our mobile apps, we may collect:

- Information about your online purchases (for example, what you have bought, when you bought it, how you paid for it and how it was dispatched)
- Information about your online browsing behaviour on our Websites and Mobile Apps
- Information about any devices you have used to access our Services (including the IP address, browser type and mobile device identifiers)
- Number of loyalty points you have earned (where applicable)
- All activity on the order, such as the date and time the order was completed
- Whether you are a new customer, a returning one or a guest

When you contact us or we contact you or you take part in promotions, competitions, surveys or questionnaires about our Services, we may collect:

- Personal data you provide about yourself anytime you contact us about our Services (for example, your name, username and contact details), including by phone, email or post or when you speak with us through social media.
- Details of the emails and other digital communications we send to you that you open, including any links in them that you click on.
- Your feedback and contributions to customer surveys and questionnaires.

## Other sources of personal data – Social Media

The social media share buttons, only transmit data once they have been clicked. The only data the social media's servers receive is referral information from our websites, such a product title and image. No personal data is transmitted.

The Facebook login feature works in a similar way, and no personal information is transmitted to Facebook. However, once the Facebook button has been clicked, any data that is gathered is from your Facebook account, such as name and Facebook ID, will be

stored within your User Account. This can be deleted, if requested – please email [info@chillistick.com](mailto:info@chillistick.com) with your request and we will delete your information. You can also log on to your account and delete this manually or use the [Right To Be Forgotten](#) form on the website.

Please note that other social media websites operated by other organisations have their own privacy policies. Please make sure you read their terms and conditions and privacy policy carefully before providing any personal data. Chillistick does not accept any responsibility or liability for websites of other organisations.

## Using your personal information

Personal Data about our customers is an important part of our business and we shall only use your Personal Data for the purposes set out in the table below. We have also identified what our legitimate interests are where appropriate.

following purposes and shall not keep such Personal Data longer than is necessary to fulfil these purposes:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact (c) Profile	Performance of a contract with you.
To process and deliver your order, including: managing payments, fees and charges; and managing your queries through our Customer Service team – this may include recording calls to our teams.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Performance of a contract with you. We may also use some of the data related to your queries for our legitimate interests of ensuring our customer service quality standards are met.
To collect and recover money owed to us in respect of your order	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary for our legitimate interests (to recover debts due to us).
To carry out fraud assessments	(a) Identity (b) Contact (c) Financial	Necessary for our legitimate interests of ensuring payments are not fraudulent

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
	(d) Transaction (e) Technical	
To process your purchase of a gift voucher from us	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract with you.
To notify you in relation to our legal obligations and documents, including changes to our terms or Privacy Policy	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests of ensuring our customers are updated on these changes.
To help us improve our offering to our customers, including asking you to leave a review or take a survey, or provide customer insights	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to improve our offering to our customers, to develop them and grow our business).
To enable you to partake in a prize draw or competition	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Performance of a contract with you to fulfil the promotion and run the competition/prize draw. We may also subsequently use your entries for the legitimate interests of understanding our customer base more effectively.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Profile (d) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).
To deliver relevant website content, advertisements and other marketing material to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business to inform our marketing strategy and to improve our offering to you).
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy). Please note that where cookies are used for this purpose, this is covered in our <a href="#">Cookies Policy</a> .

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business, and to improve our offering to you).

We do not conduct any automated decision making. We may on occasion profile our customers for the purposes of target marketing at them and where this is done, this is undertaken for our legitimate interests of ensuring our marketing is relevant to its audience. For example, we may classify an appropriate audience for a promotion by what products on our website they have previously looked at or expressed an interest in. We do not conduct any online behavioural tracking.

## Sharing personal data with 3<sup>rd</sup> party service providers

We work with carefully selected Service Providers that carry out certain functions on our behalf. These include, for example, companies that help us with processing orders, processing payments and delivering orders. We only share personal data that enable our Service Providers to provide their services.

**Essential Service Providers:** Sometimes, other businesses give us data about you which we may need for our legitimate interests of conducting business with you and on occasion they are necessary to perform our contract with you. It usually comprises Financial Data or Transaction Data. This happens when we link through to third party payment providers. They tell us that you have paid for your products and, where relevant and/or necessary they will provide us with your Contact Data and Transaction Data. We also might engage third party contractors to provide us with technical or delivery services that are related to your account with us.

**Professional Advisers and Investors:** We may also share your data with professional advisers such as our lawyers and insurers to manage risks and legal claims, and/or as part of our relationship and obligations to our investor organisations. This is in our legitimate interests.

It is possible we could sell our business to a third party or re-organise our business or become insolvent. In that scenario, our database of customers is one of the biggest parts of that business and so we would need to share it with the third-party buyer and their advisers. This is in the legitimate interests of selling our business.

We may also expand our group of companies and in this scenario we may share your data within our group in order to improve our products and services and because of some of our internal support services may be shared across the group. This is in our legitimate interests of cost efficiency and growing our business. Where this occurs, we will post a link to all group companies and their locations in this Privacy Policy and they will use it in the ways set out in this Policy.

**Law Enforcement/Legal Compliance:** We will cooperate with all third parties to enforce their intellectual property or other rights. We will also cooperate with law enforcement requests from within or outside your country of residence. This may include disclosing your personal information to government or law enforcement agencies, or private parties, when we have a good faith belief that disclosure is required by law or when we, in our discretion, believe that disclosure is necessary to protect our legal rights, or those of third parties and/or to comply with a judicial proceeding, court order, fraud reduction or legal process served on us. In such cases, we may raise or waive any legal objection or right available to us. These uses of your data are in our legitimate interests of protecting our business security.

We may also use your data and share it with the recipients listed in this Privacy Policy for the purpose of complying with our legal obligations.

Cloud storage providers - we use cloud computing platforms that securely store all of our data, including customer details.

Email service providers - in order to send you marketing content and transactional emails, we share your details with our email service providers.

Social Media Platforms – The social media share buttons, only transmit data once they have been clicked. The only data the social media's servers receive is referral information from our websites, such a product title and image. No personal data is transmitted.

The Facebook login feature works in a similar way, and no personal information is transmitted to Facebook. However, once the Facebook button has been clicked, any data that is gathered from their Facebook account, such as name and Facebook ID, will be stored within your User Account. This can be deleted, if requested – You can ask us to delete your data by completing the [Right To Be Forgotten](#) form on our website.

Please note that other social media websites operated by other organisations have their own privacy policies. Please make sure you read their terms and conditions and privacy policy carefully before providing any personal data. Chillistick does not accept any responsibility or liability for websites of other organisations.



Analytics tools - we use analytics tools to track the way that users interact with our website.

Profiling tools - we use profiling tools to understand how you engage with our website and show you content we think will be most relevant to you, based on our understanding of your interests and preferences.

Payment providers - in order to facilitate any payments made on our site, we facilitate the sharing of your Financial Data with payment providers.

Delivery providers - in order to package and mail your orders to you, it is necessary to share your information with delivery providers.

Marketing and insights providers - marketing and insights tools allow us to understand our customers better so that we may provide you with the best possible website, products and customer service experience. We may share certain information about our customers to facilitate this process.

Customer service - when you interact with our customer service team, your details are shared with our employees.

### **Third Party Websites and Links**

The chillistick website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

Please make sure you read their terms and conditions and privacy policy carefully before providing any personal data on a website as we do not accept any responsibility or liability for websites of other organisations.

### **Disclosures of your personal data**

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and they may only use your data for the purposes we specify in our contract with them. We will always work with them to protect your privacy.

### **Marketing**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. We only use the data you provide to us directly for this purpose along with the Aggregated Data provided to us by our analytics partners and we do not track what other websites you may visit after visiting our site, though in common with most websites, we may register the site which referred you to our site (e.g. a search engine).

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We generally only send electronic marketing - such as email marketing - to people who have previously bought similar products from us and this is in our legitimate interests. We will always offer a way out of receiving this marketing when you first purchase our products and in every marketing communication afterwards.

Where you have not previously bought from us but have registered your details with us (for example by entering a competition or signing up for a newsletter), we will only send you marketing communications if you opted into receiving marketing at the time and so given us your express consent (which you may withdraw at any time – see [Opting out](#) below).

## **The right to be forgotten**

You can change your personal information and update your settings at any time within the personal information section of your account.

You can ask us to stop sending you marketing messages and/or removing you from our system by using the [Right To Be Forgotten](#) form on our website.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, or related correspondence, and we will continue to process such data in accordance with this Privacy Policy and only ever as permitted by law.

Please note that your details will remain on any orders you have placed due to VAT regulations.

## **Cookies**



You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookies Policy](#).

## Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

You acknowledge that the Internet is not a completely secure medium for communication and, accordingly, we cannot guarantee the security of any information you send to us (or we send to you) via the Internet. We are not responsible for any damages which you, or others, may suffer as a result of the loss of confidentiality of such information.

## How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. For example, details of your orders will be kept for as long as we need to retain that data to comply with our legal and regulatory requirements. This is generally 7 years unless the law prescribes a longer period.

You can ask us to delete your data by completing the [Right To Be Forgotten](#) form on our website or email [info@chillistick.com](mailto:info@chillistick.com). Additionally you can login to your account and delete your data. Please note that your details will remain on any orders you have placed due to VAT regulations.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## Your Legal Rights

Under certain circumstances, you have rights under UK data protection laws in relation to your personal data.

### You have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it for example where you consider that we do not need it any longer for the purposes for which we originally collected it as explained to you in this Privacy Policy, where you have withdrawn your consent to our using it and we had relied on that consent according to this Policy, where you consider that we cannot show a ‘legitimate interest’ in continuing to process it and we have relied on that legitimate interest to process it as explained to you in this Policy . You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

## **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We aim to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is complex. In this case, we will notify you and keep you updated.

## **Changes to the privacy policy and your duty to inform us of changes**

We may need to update this Policy at any time and without notice and where we do this we will notify you by including pop up boxes on the website and/or emailing our customers. This Policy was last updated on 18 May 2018.

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes and periodically review your account settings on our website. You can contact us using the [contact page](#) or email [info@chillistick.com](mailto:info@chillistick.com) to advise us of your changes.

## Failure To Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, where you do not provide suitable delivery instructions to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## Lawful Basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by using the [Contact Form](#) or sending in your email to [info@chillistick.com](mailto:info@chillistick.com)

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<https://ico.org.uk>). In the UK, please read: <https://ico.org.uk/for-the-public/raising-concerns/> for details of

how to do this. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

**Last amended: 17 May 2018**